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August 23, 2018

VIA ECF

Hon. Gary R. Brown
United States Magistrate Judge
Eastern District of New York
Alfonse M. D'Amato Federal Building
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: Joseph Jackson v. Nassau County et al.
Docket No. 18-cv-3007 (JS) (GRB)
Our File No.: 12473.00014

Dear Judge Brown:

We are writing with the consent of plaintiff's counsel to request that the time for plaintiff to serve his complaint on the various Nassau County individual defendants be extended under Fed. R. Civ. P. 4(m) to September 24, 2018, and that the Nassau County defendants be granted until October 5, 2018 to answer or otherwise respond to the complaint. The complaint was filed on May 22, 2018 and, absent an extension, plaintiff's time to serve has expired. The last day for the Nassau defendants to respond to the complaint is September 5, 2018.

This action involves at least 34 defendants who were formerly employed by Nassau County and who are either retired or deceased. Locating the retired defendants (many of whom live out of state), doing our due diligence to rule out conflicts and securing their consent to have the Police Department accept service on their behalf has taken significantly longer than anticipated. In the event that any particular retired defendant refuses to consent to service on the Police Department (which has not yet been the case), plaintiff's counsel will need to make appropriate arrangements. We are working together to complete these preliminaries as quickly as possible. Concerning the deceased defendants, we are securing Death Certificates to file with the Court.

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Under the circumstances, we jointly request these extensions.

Respectfully submitted,

Wilson, Elser, Moskowitz, Edelman & Dicker LLP

A handwritten signature in black ink, appearing to read 'P. Meisels', written over the printed name.

Peter A. Meisels

PAM:lh
Enclosure

cc: All counsel via ECF